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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR08-477 DLJ
	)	
Plaintiff,	)	GOVERNMENT'S MOTION FOR SHORT
	)	EXTENSION TO FILE FINANCIAL
v.	)	SUBMISSIONS IN OPPOSITION TO
	)	COURT-APPOINTED COUNSEL
EDITH NELSON, RONALD NELSON,	)	
and NELDA ASUNCION,	)	Next Hearing Date: September 10, 2008
	)	Magistrate Judge Wayne D. Brazil
Defendants.	)	
_____	)	

1. The United States of America, through the undersigned Assistant United States Attorney, has completed its financial submissions in opposition to defendant Cristeta Lagarejos' request for court-appointed counsel. Those submissions will be timely filed *ex parte* and under seal before the Clerk's Office closes today at 4 p.m.

2. The due date for the government's financial submissions in opposition to defendant Nelda Asuncion's request for court-appointed counsel is due today, September 2, 2008, by 5 p.m.. The due date for the government's financial submissions in opposition to the requests by defendants Ronald and Edith Nelson for court-appointed counsel are due tomorrow, September 3, 2008, at 5 p.m.

3. The United States respectfully request permission to file its submissions regarding defendant Nelda Asuncion on September 3, 2008, by 9:30 a.m. (rather than 9/2/08 at 5 p.m.), and its submissions regarding defendants Ronald and Edith Nelson on September 4, 2008 by 9:30 a.m. (rather than 9/3/08 at 5 p.m.). As this Court will observe based upon the government's completed submissions regarding defendant Cristeta Lagarejos, the process of analyzing an enormous volume of evidence has been an extremely time-consuming process. The government has organized its submissions in a manner designed to expedite this Court's review. The government's submissions regarding defendant Nelda Asuncion is equally as time-consuming, and significantly more time-consuming regarding defendants Ronald and Edith Nelson. Government's counsel worked on two of the three days over this past holiday weekend. In addition to the volume of evidence that needed to be reviewed, government counsel's efforts were handicapped by the constant, ear-pounding, blasting music that was played immediately outside the federal courthouse every day until 6 p.m. over the weekend.

4. Government's counsel apologizes for any inconvenience to this Court.

Respectfully submitted,

JOSEPH P. RUSSONIELLO  
United States Attorney

9/2/2008  
Dated

/s/  
DEBORAH R. DOUGLAS  
Assistant United States Attorney

**IT IS SO ORDERED.**

September 2, 2008  
Dated

  
HONORABLE WAYNE D. BRAZIL  
United States Magistrate Judge